

**REMARKS**

This application is believed to be in condition for allowance at the time of the next Official Action.

The Official Action withdraws the previous indication of allowability as to claims 11 and 22. In the current non-final action, both claims are rejected under 35 U.S.C. §103(a) as unpatentable over the admitted prior art in view of the newly applied U.S. Patent No. 5,805,178 to SILVERBROOK. Reconsideration and withdrawal of this rejection are respectfully requested for the following reasons:

The Official Action attributes to the admitted prior art of all of the features recited in the first paragraph of independent claim 11. The Official Action acknowledges that the features recited in the second paragraph are absent from the admitted prior art, and relies on the SILVERBROOK reference for such teachings.

The paragraph in question recites:

an illumination range of the printing light on the instant film by the exposure device is determined to be larger than the exposure area, so the entire exposure area may be exposed even where the instant film deviates from a predetermined position relative to the exposure device.

Among the recited features is the requirement that the illumination range of the printing light be "larger than the exposure area" of the instant film. In connection with this feature, the Official Action identifies the following language from the SILVERBROOK patent:

During printing, the recording medium 51 is continually moved relative to the print head 50 by the paper transport system 65. If the print head 50 is the full width of the print region of the recording medium 51, it is only necessary to move the recording medium 51 in one direction, and the print head 50 can remain fixed. If a smaller print head 50 is used, it is necessary to implement a raster scan system. This is typically achieved by scanning the print head 50 along the short dimension of the recording medium 51, while moving the recording medium 51 along its long dimension.

While the present claim requires the illumination range to be larger than the exposure area, the reference states that the print head length is the same as the width of the print region. Having the pertinent print head dimension match the corresponding dimension of the medium is simply not the same as exceeding such dimension.

Additionally, the remaining claim language further emphasizes such distinction. By requiring that "the entire exposure area may be exposed even where the instant film deviates from a predetermined position relative to the exposure device," the claim specifically precludes an arrangement such as that of SILVERBROOK. Given that the SILVERBROOK print head matches the width of the print region, any deviation between the intended and actual alignment between the SILVERBROOK print head and recording medium will result in an area of the print region that is left unprinted.

Finally, there remains the question of the appropriateness of combining the admitted prior art and the SILVERBROOK references to teach the recited invention. The

present invention is directed to a printing method for recording a latent image in an exposure area of a predetermined size on an instant film. This characteristic of the present invention is manifest not only in the preamble of rejected claim 11, but also in the recitation in the second paragraph of "an illumination range of the printing light on the instant film by the exposure device," which clearly defines a characteristic of a photosensitive printing approach.

The SILVERBROOK patent devotes itself exclusively to ink jet printing. In connection with the ink jet process, there is no exposure area *per se* on the recording medium. The paper, or other medium upon which ink jet printers produce images, is capable of accepting ink edge-to-edge. Therefore, the exposure area of the medium is anywhere over which the print head can be positioned. As a result, the ink jet print head cannot, by definition, print on the medium outside the exposure area, because the exposure area exists wherever the print head is positioned. This fact bears not only on claim 11, but also on claim 22, which specifies that the photosensitive area is smaller than the overall dimensions of the instant film.

For these reasons, applicants respectfully suggest that the present rejection cannot reasonably be maintained.

In light of the analysis provided above, applicants believe that the present application is in condition for

allowance, and an early indication of the same is respectfully requested.

If the Examiner has any questions or requires further clarification of any of the above points, the Examiner may contact the undersigned attorney so that this application may continue to be expeditiously advanced.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Robert J. Patch', written over a horizontal line.

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